

REMARKS

The final Office action of 29 December 2006 (Paper No. 20061221) has been carefully considered.

Claim 15 is being amended and claim 21 is being added. Thus, claims 1 thru 21 are pending in the application.

Of all pending claims 1-21, claims 1-14 and 18-20 were withdrawn from further consideration. Nevertheless, for the reasons previously stated during prosecution of this application, which are incorporated herein by reference thereto, it is respectfully submitted that a restriction requirement should not have been imposed in this application.

Claims 15 thru 17 are rejected under 35 U.S.C. §103 for alleged unpatentability over Burroughes *et al.*, British Patent Publication No. 2 349 979 in view of Winters *et al.*, U.S. Patent No. 6,737,800. For the reasons stated below, it is submitted that the invention recited in the claims, as now amended, is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103.

Independent claim 15 was previously amended to recite that each of the anode electrodes of the red, green and blue unit pixels includes a first film having a high reflectivity and forming a first anode, and a second film for adjusting a work function and

forming a second anode. Furthermore, independent claim 15 was also amended to recite that the second anode of at least one unit pixel of the red, green and blue unit pixels has a thickness different from thicknesses of the second anodes of other unit pixels of the red, green and blue unit pixels. Claim 15 is now being further amended to recite that the first and second anode electrode materials are patterned by using photosensitive film patterns having thicknesses different from each other, depending upon the red, green and blue unit pixels.

Dependent claims 16 and 17 were amended so that dependent claim 16 recites that the second anode of the red unit pixel is thicker than the second anodes of the other unit pixels, while claim 17 recites that a thickness of the second anode of the red unit pixel is in a range of one of 250 to 450Å and 700 to 750Å, that a thickness of the second anode of the green unit pixel is in a range of one of 50 to 150Å and 200 to 300Å, and that a thickness of the second anode of the blue unit pixel is in a range of 50 to 150Å. Dependent claim 21 is being added to recite that the photosensitive film patterns are formed by a photo process using a half-tone mask.

It is respectfully submitted that, as a result of these amendments, the invention recited in independent claim 15 is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103, while dependent claims 16, 17 and 21 provide further bases for distinguishing the invention from the cited prior art.

Specifically, neither Burroughes *et al.* '979 nor Winters *et al.* '800 discloses or suggests a method for fabricating an organic electroluminescent display wherein: (1) etching of first and second anode electrode materials results in the formation of anode electrodes of the red, green and blue unit pixels, wherein each of the anode electrodes of the red, green and blue unit pixels includes a first film having a high reflectivity and a second film for adjusting a work function; (2) wherein the first and second films contained in the anode electrodes of the red, green and blue unit pixels form a first anode and a second anode, respectively, in the red, green and blue unit pixels; (3) wherein the second anode (or second films for adjusting a work function) of at least one unit pixel of the red, green and blue unit pixels has a thickness different from thicknesses of the second anodes (or second films for adjusting a work function) of other unit pixels of the red, green and blue unit pixels; and (4) wherein the first and second anode electrode materials are patterned by using photosensitive film patterns having thicknesses different from each other, depending upon the red, green and blue unit pixels.

In the latter regard, it should be noted that, when anode electrodes having different thicknesses are formed, the effects of process simplification and yield improvement are produced, since an additional process is excluded. The cited art does not disclose or suggest this feature or the advantage thereof.

On page 2 of the final Office action, the Examiner alleges that Burroughes *et al.*

'979 discloses the disposition sequentially of a first anode material and a second anode material, followed by masking and etching the first and second anode materials to isolate and form anode electrodes of different pixels. However, on page 3 of the final Office action, the Examiner admits that "Burroughes does not exemplify red, green and blue unit pixels (which is very well known in the art for multi-color display) and the second anode of at least one pixel having a thickness different from the thickness of the second anodes of other unit pixels of red, green and blue unit pixels" (quoting from page 3, lines 10-13 of the final Office action). As a result, the Examiner cites Winters *et al.* '800 as allegedly disclosing "the thickness of the second anode electrode 112a in one pixel (red pixel) is different from the thicknesses of the second anodes 112b, 112c of other unit pixels of green and blue" (quoting from page 3, lines 20-22 of the final Office action).

However, Winters *et al.* '800 does not disclose or suggest etching of first and second anode electrode materials to form anode electrodes. In fact, whereas Winters *et al.* '800 states that the "thicknesses of the first transparent electrode 112 can then be reduced in the region of other pixel colors by well known photolithography and etching processes" (quoting from column 18, line 67-column 19, line 1 of the patent), Winters *et al.* '800 also states that "[i]t is an object of the present invention that the layers of the organic EL media 120 not require any patterning between and around the pixels, and therefore these layers cannot be varied in thickness for different color pixels ... [and] only the thickness of the first transparent electrode is varied for pixels of different colors"

(quoting from column 18, lines 50-56 of the patent). This indicates that only the first transparent electrodes 112a, 112b and 112c (the “second anode electrode” according to the Examiner’s analysis at page 3, line 18 of the final Office action) are subjected to etching in Winters *et al.* ‘800, and that the other electrodes, including the reflective layer 102 (the “first anode electrode” according to the Examiner’s analysis at page 3, lines 17-18 of the final Office action), are not subjected to etching.

Thus, Winters *et al.* ‘800 does not disclose or suggest the etching of first and second anode electrode materials to form anode electrodes, each including a first film having a high reflectivity and a second film for adjusting a work function, as recited in claim 15. Therefore, it cannot be said that Winters *et al.* ‘800 discloses the method recited in independent claim 15. Accordingly, even if the two cited references are combined, the invention of claim 15 is not obtained. Furthermore, it is highly doubtful that one of ordinary skill in the art, upon reviewing the disclosure of Burroughes *et al.* ‘979, would be motivated or instructed to seek and obtain the disclosure of Winters *et al.* ‘800 so as to modify the disclosure of Burroughes *et al.* ‘979 in an effort to obtain the claimed invention. It is respectfully submitted that the only reason that the Examiner has been able to arrive at the combination of the two references is that the Examiner, unlike one of ordinary skill in the art as of the date of the invention, has had the benefit of reviewing the disclosure of the present application, and has utilized the knowledge gained from the disclosure of the present application in order to arrive at the combination

of references cited under 35 U.S.C. §103.

As mentioned above, dependent claims 16, 17 and 21 provide further bases for distinguishing the invention from the cited prior art. That is to say, neither of the two references discloses or suggests a second anode (or second film) of the red unit pixel being thicker than the second anode (or second films) of the other unit pixels, as recited in dependent claim 16. In that regard, on page 4 (lines 13-14) of the final Office action, the Examiner contends that Winters *et al.* '800 discloses that film 112a is thicker than the other films in Figure 3, but it is not clear that the film 112a of Winters *et al.* '800 corresponds to a red pixel.


Furthermore, neither of the references, either alone or in combination, discloses or suggests the method wherein a thickness of the second anode (or second film) of the red unit pixel is in a range of one of the two ranges specifically recited in claim 17, wherein a thickness of the second anode (or second film) of the green unit pixel is in a range of one of the two recited ranges, and wherein a thickness of the second anode (or second film) of the blue unit pixel is in the recited range, as also specifically recited in claim 17.

Finally, neither of the references discloses or suggests the use of photosensitive film patterns which are formed by a photo process using a half-tone mask, as recited in claim 21.

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

A Request for Continued Examination, a Petition for a one month extension of time and Applicant's check for their respective fees combined accompany this Preliminary Amendment. Should the Petition become lost, the Commissioner is requested to treat this paragraph as a petition for an extension of time, and should the check become lost, be deficient in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of such fees.

Respectfully submitted,



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